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22CV16510IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF LANE

In re Judicial Dissolution of,  
**Zadeh Kicks LLC dba Zadeh Kicks,**  
the Petitioner.

Case No. 22CV16510  
**RECEIVER'S REPORT NO. 15**

David P. Stapleton, the court-appointed receiver ("Receiver") for the above-entitled action, respectfully submits the following Report No. 15.

**I. Appointment and Takeover**

Petitioner Zadeh Kicks LLC ("Petitioner" or "Zadeh Kicks"), through its sole member, Michael Malekzadeh ("Malekzadeh") (together, "Petitioners"), filed a motion with this Court for judicial dissolution of Zadeh Kicks and for an order appointing a receiver to assist with Petitioner's voluntary dissolution and to take possession, control, management, and operation of Petitioner's assets (the "Receivership Estate") for the purpose of liquidating them in an orderly manner.

On May 20, 2022, the Order Appointing Receiver (the "Order") was entered by this Court. The Receiver immediately took possession of the Receivership Estate and met with Malekzadeh and his counsel at the Zadeh Kicks offices to discuss the takeover of the Receivership Estate and the Receiver's role.

**II. Background and Takeover**

Zadeh Kicks was a premium brand sneaker resale company that was formed in 2013. Zadeh Kicks experienced exponential growth in business from January 2020 to May 2022. The Petitioner's liabilities greatly exceed its assets, rendering Zadeh Kicks insolvent with many

1 unfulfilled orders pending with the company. The Petitioner requested the appointment of a  
2 receiver to marshal and liquidate assets and to handle claims from numerous creditors.

3 Due to the initial exposure of the news related to the takeover of the Zadeh Kicks business  
4 by the Receiver and the social media traffic that included pictures of the warehouses and direct  
5 personal threats to Malekzadeh, the Receiver contracted with a security vendor to monitor the  
6 facilities and installed security cameras at all locations. The Receiver continues to maintain  
7 security at the facilities.

### 8 **III. Communication and Cooperation with Third Parties**

9 The Receiver continues to communicate, share information, and work collaboratively with  
10 the third-party service providers that serviced platforms used in the Zadeh Kicks business,  
11 including Shopify (website, e-commerce store, payment processor), PayPal (merchant), Rise.ai  
12 (gift cards) and United Parcel Service (“UPS”) (shipping) to obtain and share information helpful  
13 in reviewing the validity of credit card chargebacks on customer credit cards.

### 14 **IV. Operations**

15 Prior to the Receiver’s appointment, Zadeh Kicks disabled the ordering function of its  
16 website so that no new orders of sneakers could be placed. As of the date of the Receiver’s  
17 appointment, Zadeh Kicks was operating on a limited basis by filling outstanding orders for which  
18 the company had inventory in stock.

19 Upon his appointment, the Receiver immediately ceased any fulfillment of orders and  
20 instead focused his efforts on a sale strategy to maximize recovery for the benefit of all creditors.  
21 This sales strategy was approved by the Court.

22 Three employees remain on payroll. These individuals continue to organize and count  
23 inventory, stage for the Court approved sale process, prepare items to be posted to online  
24 marketplace platforms and sold through court-approved bulk orders, and process and ship orders.

25 Most of the Receiver’s efforts at this time relate to monitoring marketplace sales and  
26 negotiating and finalizing bulk sales as described further in Section VI below to continue to

1 strategically reduce the inventory. The Receiver will utilize additional personnel as needed to assist  
 2 with large sales volumes and certain assistance with bulk sales for buyers interested in a significant  
 3 purchase (detailed further below).

4 **V. Communication with Investors / Creditors / Victims**

5 Creditor inquiries remain low in volume, though additional parties continue to request to  
 6 be added to the special notice list after the transmittal of the Receiver report each month. As of the  
 7 date of this report, 1,096 parties have been added to the special notice list. While Donlin Recano  
 8 & Company (“DRC”) is no longer involved directly in customer communications, it continues to  
 9 host the website that was set up upon engagement with DRC, which contains frequently asked  
 10 questions for customers as well as a copy of the Order and other case documents that are being  
 11 uploaded periodically as needed.

12 Creditors continue to email and call the Receiver’s office to request details regarding prior  
 13 orders, timing, the value of assets, and the ability to submit bulk offers for portions of the sneaker  
 14 inventory, and the Receiver’s office is responding accordingly.

15 **VI. Sale of Inventory**

16 On November 28, 2022, this Court approved the Receiver’s proposed liquidation plan,  
 17 which consisted of offering shoes for sale on eBay.com, among other avenues. The Receiver  
 18 actively monitors eBay.com sales and adjusts pricing and promotion as necessary. Gross sales have  
 19 eclipsed \$8,265,000 to date through November 30, 2023, which includes bulk sales totaling  
 20 approx. \$4.5 million (which took place with the consent of Lead Bank as summarized below). The  
 21 Receiver continues to monitor sales, along with the impact of certain promotional and pricing  
 22 strategies for listings and their impact on sales growth.

23 In addition to sales generated through eBay, the Receiver continues to communicate with  
 24 bulk buyers for significant purchase volumes as offers are received. The Receiver has finalized  
 25 eight bulk sales through November 30, 2023, totaling roughly 25,266 pairs for approximately \$4.5  
 26 million. The Receiver continues to review bulk offers to maximize recoveries and reduce expenses

1 through expediting sales and as of the date of the report has executed two additional bulk sales for  
 2 which the proceeds are not contemplated in this report. Furthermore, subsequent to the period  
 3 ended November 30, 2023, through which this report covers, the Receiver has finalized an  
 4 additional bulk sales for which proceeds will be reflected in the next report.

5 Generally, bulk sale offers range anywhere between 100 pairs of sneakers to 5,000 pairs of  
 6 sneakers in a single transaction, but the Receiver has also received offers for substantially all  
 7 sneakers on hand. To date, no offers for the entirety of the inventory have been strong enough to  
 8 warrant an application to this Court based on a comparison to the pacing of marketplace and other  
 9 bulk sales. The Receiver continues to review all offers and structure potential sales that  
 10 appropriately weigh the benefits of selling larger quantities of sneakers at slightly discounted  
 11 prices against the future overhead costs of storing that inventory, with the goal of maximizing the  
 12 recovery for the receivership estate. Any bulk sales of inventory will continue to be as-is, where-  
 13 is, all-cash sales. To the extent the Receiver obtains a bulk offer for the entirety – or substantially  
 14 all – of the remaining inventory, the Receiver will return to this Court to seek approval of this sale.

15 While the Receiver is heavily focused on strategically reducing inventory levels at suitable,  
 16 market-rate prices, he is also working to reduce Overhead and other costs where necessary as  
 17 Inventory is depleted.

## 18 **VII. Cash and Financial Statements**

19 At the time of the appointment of the Receiver, the Petitioner had several pre-existing bank  
 20 accounts at Chase Bank and Lead Bank and the Receiver immediately contacted the banks to take  
 21 possession of cash. The following is a summary of cash activity for the receivership period since  
 22 the Receiver's appointment and ending November 30, 2023:

23	Beginning Cash, 5/20/2022	\$	-
24	Cash Receipts – Bank account takeover		2,207,302
25	Sales of Sneaker Inventory, net of selling fees		7,721,392
	Interest Income		91,816
26	Payroll Expense		(277,810)

Rent Expense	(202,605)
Security Expense	(219,862)
Distribution to Secured Creditor	(1,570,673)
All Other Expenses	(2,105,201)
<b>Ending Cash, 10/31/2023</b>	<b>\$ 5,644,359</b>

\* Note that there has been \$8,265,207 of gross sales of the sneaker inventory for the receivership period ending November 30, 2023. Accordingly, a timing difference and eBay selling fees and taxes account for the difference between the \$7,721,392 noted in the financials above and the \$8,265,207 in gross sales.

Attached as **Exhibit "A"** is a summary of cash receipts and disbursements since inception to date through November 30, 2023. There remains approximately \$2.1 million which is not included in the cash number above and which is subject to further dispute regarding offsets by Chase Bank and Lead Bank as discussed further in *Section XI* below.

This report represents the first report wherein the Receiver has shifted his monthly reporting to month-end to capture cash and financial statements through month-end as opposed to mid-month. The Receiver will continue to submit monthly reports after the prior month's end unless and until the Court requests that the Receiver do differently.

#### **VIII. Turnover of Bank Accounts and Offsets**

As summarized above, the Receiver took possession of bank accounts consisting of cash of approximately \$1.7 million, which represents certain funds that were being held by Chase Bank ("Chase") and \$485,000 that was turned over from Zadeh Kicks' counsel. There are additional amounts from Chase Bank (approximately \$1.4 million) and Lead Bank (approximately \$710,000) that have not been turned over.<sup>1</sup>

<sup>1</sup> A summary of all bank balances with indication of those which have been turned over to the Receiver as of the date of this report and those which have not is included at the bottom of Exhibit "A."

As mentioned above, Lead Bank did not object to the Receiver's stipulation granting approval for the first two bulk sales.

### **IX. Lawsuits**

*American Express v. Malekzadeh, et al.*, Case No. 6:22-cv-01070-AA (Dist. Or.)

On July 21, 2022, American Express National Bank ("AmEx"), filed a complaint in United States District Court, District of Oregon, Eugene Division, Case No. 6:22-cv-01070-AA against Michael Malekzadeh and Bethany Mockerman alleging various claims including breach of contract and fraud in an effort to collect unpaid balances that are past due on various credit card accounts that American Express issued either to Malekzadeh personally or to Zadeh Kicks LLC. It is the Receiver's understanding that the case is currently stayed.

### **X. Forensic Accounting / Review**

The Receiver has substantially completed his forensic accounting effort to summarize the sources and uses of cash for Zadeh Kicks and has reviewed significant customer accounts, defined as those with the largest number of shoe purchases. This is critical as this forensic analysis explains how investor and creditor funds were used. As was the case with the inventory, Zadeh Kicks did not have sophisticated procedures related to its accounting and financial reporting function. As a result, there is no comprehensive set of books and records / financial statements.

Instead, the Receiver has compiled data from various sources including bank statements, Shopify order histories, and other sources to understand historical cash flow. The Receiver is continuing his financial accounting review as of the date of this report.

The Receiver determined that the best value add to the investors was to produce investor capital balances based on a money-in, money-out ("MIMO") approach. The MIMO analyses will serve as the foundation for the development of a distribution plan to be presented to the Court at a later date.

The Receiver's forensic accounting has also identified "net winners" – meaning those investors who have received more money than they contributed – and "net losers" – meaning those

investors who did not receive as much (or any) money back from what they contributed and who therefore would have legitimate claims in the receivership estate. The Receiver presented a Motion for Approval of Initiating Claw-Back Litigation Against Net Winners, which included a summary of 19 “net winners” identified to date with total aggregate funds sent to these 19 parties of more than \$16 million in excess of what these parties contributed to Zadeh.<sup>2</sup> This Court approved this motion on March 28, 2023. Of the 50+ customers reviewed to date which resulted in identifying 19 “net winners”, these customers were derived first from those customers with the largest amount of shoe purchases and then expanded to a wider group of investors based on those customers receiving large payments from the Zadeh bank accounts.

The Receiver initially sent an opening claw-back letter making a demand to each of the “net winners” who were unjustly benefited from the Company’s operations. Eighteen of the nineteen “net winners” initially responded and the Receiver attempted to engage in settlement negotiations with each of them. The Receiver’s initial goal was to attempt to settle with the “net winners” at a slightly discounted amount in exchange for avoiding potentially costly litigation with the Receivership Estate. For certain of the “net winners” who expressed that they do not have the financial means to pay the settlement amount offered by the Receivership Estate, the Receiver required that they complete a detailed financial package so that he could assess the validity of these statements.<sup>3</sup> Similarly, for certain of the “net winners” who expressed disagreement in the amount the Receiver believes is owed to the Receivership Estate, the Receiver attempted to share detailed documentation to reconcile this disagreement. The Receiver has now concluded nearly all such

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<sup>2</sup> Note that the Receiver looked at net winners on a cash basis – meaning cash contributed via check or wire that was deposited into a bank account, less any checks or wires paid back to those parties from the bank accounts – as well as factoring in the value of any sneakers shipped to those customers.

<sup>3</sup> Specifically, the Receiver required any “net winner” that claimed an inability to pay to provide the financial information required by the Security and Exchange Commission on its Form D-A, which is used whenever there is a claim of the inability to pay disgorgement, interest or penalties in an SEC action.

1 settlement discussions and will seek Court approval of any finalized settlement agreements in  
 2 January, 2024. The Receiver has also filed the below listed net winner actions.<sup>4</sup>

3 On September 22, 2023, the Receiver began filing complaints against net winners in the  
 4 Circuit Court of the State of Oregon for the County of Lane including the following: (1) Deadstock  
 5 LA, Inc., a California corporation and Ely Halavi, an individual dba Yeezus We Trust (Case No.  
 6 23CV40344); (2) Johnny Davis, an individual (Case No. 23CV42276; (3) Anthony Varela, an  
 7 individual dba Sixteen Ten (Case No. 23CV42272); (4) The Keystone Market LLC, a North  
 8 Carolina limited liability company (Case No. 23CV42278); (5) Kickstopny LLC, a New York  
 9 limited liability company (Case No. 23CV42279); (6) No Contest, LLC, a New Jersey limited  
 10 liability company (Case No. 23CV42289); (7) Soleserious LLC, a New Jersey limited liability  
 11 company (Case No. 23CV4227); (8) Twenty-Two Shoes, LLC, a New Jersey limited liability  
 12 company (Case No. 23CV38807) (9) Air Drizzy Kicks, LLC, a New York limited liability  
 13 company (Case No. 23CV46211); (10) The Sneak Peek, LLC, an Ohio limited liability company  
 14 (Case No. 23CV46219); (11) Just My Kicks, LLC, a New Jersey limited liability company (Case  
 15 No. 23CV46182); (12) Myths, LLC, a New York limited liability company (Case No.  
 16 23CV48583); (13) Idanks, LLC, a New Jersey limited liability company (Case No. 23CV48584);  
 17 (14) Katstrike, Inc., a New York corporation (Case No. 23CV50111); (15) Trendz, LLC a New  
 18 York limited liability company (Case No. 23CV50112); and (16) Aden Trano, an individual (Case  
 19 No. 23CV42275).

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25 <sup>4</sup> The Receiver's understanding is that pursuant to ORS 37.290 each action against a "net  
 26 winner" will be filed as adjunct to the Receivership matter, and automatically assigned to this  
 Court.



1           **XI.     Subpoenas to Shopify**

2           On or about May 12, 2023, the Receiver's counsel served subpoenas on Shopify Payments  
 3 (USA) Inc. and Shopify (USA), Inc. seeking documents related to Shopify's policies regarding  
 4 issuing gift cards in lieu of cash or goods, and its communications with Zadeh Kicks, and its  
 5 officers. At the request of Shopify's counsel, on or about May 23, 2023, the Receiver's counsel  
 6 met and conferred with Shopify's counsel regarding the subpoenas. Shopify's position is that  
 7 neither of the entities served by the Receiver was in possession, custody, or control of any of the  
 8 documents sought, even though Shopify previously produced documents requested by the  
 9 Receiver in 2022. Shopify now takes the position that the Receiver's only recourse to obtain  
 10 documents is to issue an international subpoena to Shopify's Canadian parent, Shopify, Inc. (using  
 11 Canadian process). The Receiver's counsel disagrees with Shopify's position and filed a motion  
 12 to compel the production of documents, which was heard on August 7, 2023. On August 21<sup>st</sup>, a  
 13 supplemental brief was filed regarding the same, and the matter is currently under submission. On  
 14 October 5, 2023, the Court issued a minute order denying the Receiver's motion.

15           **XII.   Legal**

16           Pursuant to the Order and application to this Court, the Receiver engaged Buchalter, A  
 17 Professional Corporation, as Receiver's counsel to advise the Receiver on the complexities of the  
 18 receivership estate. Attached as **Exhibit "B"** are Buchalter's invoices for October and November  
 19 2023, respectively in the amounts of \$30,636.61 and \$43,223.01. Concurrent with this filing, the  
 20 Receiver filed a Notice of Compensation of Professionals containing this invoice and will send it  
 21 to all parties on the attached service list.

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1 **XIII. Receiver's Fees and Expenses**

2 The Receiver's fees and expenses for October and November 2023, respectively, are  
3 \$54,293.33 and \$43,432.96. Concurrent with this filing, the Receiver filed a Notice of  
4 Compensation of Professionals containing this invoice and will send it to all parties on the attached  
5 service list. Attached as **Exhibit "C"** are the Receiver's invoices for October and November 2023.

6  
7 DATED this 22nd day of December 2023.

8  
9 By

  
\_\_\_\_\_  
David P. Stapleton  
Court Appointed Receiver

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing RECEIVER'S REPORT NO. 15 on the parties listed below by the method(s) indicated and on the attached Special Notice List via email on the date set forth below:

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DATED this 22<sup>nd</sup> day of December, 2023.

/s/ Daniel P. Larsen

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David Stapleton, Receiver for  
 Zadeh Kicks, LLC  
 Schedule of Receipts & Disbursements thru 11/30/2023

	<u>Inception- To-Date</u>	
<b>Beginning Cash, 5/20/2022</b>	<b>\$ -</b>	
<b>Cash Receipts from Bank Accounts <sup>1</sup></b>		
From Atty Trust Account	485,000 <sup>2</sup>	
From Chase Bank	1,722,302 <sup>2</sup>	
<b>Total Cash Receipts from Bank Accounts</b>	<b>2,207,302</b>	
Receipts from Sneaker Sales	7,721,392	7,635,391.96
Interest Income	91,816	3,237,747
<b>Total Receipts</b>	<b>10,020,510</b>	<b>4483645.36</b>
<b>Cash Disbursements</b>		
Distribution to Lead Bank (secured creditor)	(1,570,673)	
Insurance Expense	(359,288)	
Payroll Expense	(277,810)	
Professional Fees	(28,396)	
Rent Expense	(202,605)	
Security Expense	(219,862)	
Utilities, Trash & Phone	(18,713)	
Office Expenses	(23,033)	
Receiver's Fees & Expenses	(1,005,160)	
Receiver's Counsel	(670,611)	
<b>Total Disbursements</b>	<b>(4,376,151)</b>	
<b>Ending Cash, 11/30/2023</b>	<b>\$ 5,644,359</b>	

<sup>1</sup> Refer to table below for details regarding cash collected by the Receiver to-date as reconciled to the list of bank accounts and balances reported as of takeover, 5/20/2022.

<sup>2</sup> As confirmed at the hearing on July 14, 2022, these funds are controlled and held by the Receiver in the Receiver's Trust Account.

From Atty Trust Account	\$ 485,039	Received and included in cash above
From Chase Bank	1,722,302	Received and included in cash above
Additional Amounts due from Chase Bank	1,423,320	Pending resolution
Amounts due from Lead Bank	710,963	Pending resolution
	<b>\$ 4,341,624</b>	



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File Number OB	S1485-4	DAVID P. STAPLETON ZADEH LIQUIDATION AND RECOVERY	10/31/23 1251276-002 Page 1	
Date	Tkpr	Description of Services Rendered	Hours	Amount
10/02/23	OB	PREPARE FOR AND CALL COUNSEL FOR BRANDON KICKS REGARDING CLAIMS PROCESS AND RELATED ISSUES; REVIEW LETTER REGARDING SAME.	.8	680.00
10/02/23	OB	PREPARE FOR AND CALL COUNSEL FOR TRUSTEE OF SCHMIDTY KICKS REGARDING CLAIMS PROCESS AND RELATED ISSUES; REVIEW CORRESPONDENCE REGARDING SAME.	.7	595.00
10/02/23	OB	REVIEW DOCUMENTS PRODUCED BY NET WINNER REGARDING ACCOUNTING; EMAIL RECEIVER REGARDING SAME.	.4	340.00
10/02/23	DPL	EMAILS WITH OREN BITAN REGARDING FILING OF ADDITIONAL COMPLAINTS; EMAILS AND CONFERENCE WITH ASSISTANT REGARDING SAME, AS WELL AS DISCOVERY REQUESTS TO BE SERVED WITH COMPLAINTS; EMAIL POKUAA ENIN REGARDING COMPLAINTS AND DISCOVERY REQUESTS.	.6	405.00
10/02/23	PE	VERIFY AMOUNTS PAID OUT TO TWENTY TWO SHOES FOR REQUESTS FOR ADMISSIONS (.40); TRANSMIT TO CLIENT DOCUMENTS RECEIVED FROM TRENDZ COUNSEL (.20);	.6	246.00
10/03/23	OB	REVIEW AND REVISE RECEIVER'S MONTHLY REPORT; EMAIL RECEIVER REGARDING SAME.	.4	340.00
10/03/23	OB	REVIEW DRAFT OF NET WINNER COMPLAINTS AND DISCOVERY; REVIEW STATUS OF NEGOTIATIONS WITH NET WINNERS AND RELATED ACCOUNTINGS; EMAIL COUNSEL FOR NET WINNERS REGARDING SAME.	1.3	1,105.00
10/03/23	DPL	EMAILS WITH OREN BITAN AND POKUAA ENIN REGARDING DISCOVERY REQUESTS TO BE SERVED WITH COMPLAINTS, AS WELL AS FILING OF TWENTY-TWO SHOES COMPLAINT; EMAILS WITH MR. BITAN AND MS. ENIN REGARDING DISCOVERY MANAGEMENT.	.4	270.00
10/03/23	PE	REDACT INVOICE (.20) ; DRAFT DISCOVERY/REVIEW COMPLAINTS TO NET WINNERS (1.00)	1.2	492.00
10/04/23	PE	RESEARCH SERVICE ADDRESSES FOR NET WINNERS (1.00)	1.0	410.00
10/05/23	PE	DRAFT REQUEST FOR PRODUCTION OF DOCUMENTS (.10)	.1	41.00
10/10/23	WMM	EMAIL CORRESPONDENCE RE ONGOING SETTLEMENT NEGOTIATIONS WITH NET WINNERS AND FILING COMPLAINTS; FACTUAL RESEARCH RE SAME.	.3	210.00
10/10/23	OB	REVIEW SEVEN NET WINNER COMPLAINTS AND RELATED DISCOVERY; REVIEW UNDERLYING DOCUMENTS RELATED TO SAME.	2.8	2,380.00
10/10/23	DPL	EMAILS WITH OREN BITAN REGARDING REVIEW OF COMPLAINTS BEFORE FILING AND SUBMISSION OF PRO HAC VICE APPLICATIONS; REVIEW AND MODIFY FOR FILING COMPLAINTS AGAINST ANTHONY VARELA, ADEN TRANO, JOHNNY DAVIS, KEYSTONE MARKET, SOULSERIOUS, KICKSTOP NYC, NO CONTEST, AND AIR DRIZZY; REVIEW PRIOR CORRESPONDENCE WITH WARD GREENE ABOUT SETTLEMENT OFFERS; EMAIL WARD GREENE REGARDING FILING OF COMPLAINT AGAINST NO CONTEST.	2.3	1,552.50
10/10/23	PE	DRAFT DISCOVERY REQUESTS (.20)	.2	82.00
10/11/23	OB	REVIEW DOCUMENTS AND RESEARCH ACCOUNTING PERTAINING TO TWO NET WINNERS; CALL RECEIVER REGARDING SAME; EMAIL COUNSEL FOR M.. MALEKZADEH REGARDING SAME.	.8	680.00
10/12/23	OB	PREPARE FOR AND CALL COUNSEL FOR OREGON DEPARTMENT OF JUSTICE REGARDING CASE STATUS; EMAIL COUNSEL REGARDING SAME.	.8	680.00
10/12/23	OB	REPEATEDLY EMAIL AND CALL COUNSEL FOR NET WINNER REGARDING RECEIVERSHIP CLAIMS; EMAIL AND CALL RECEIVER REGARDING SAME.	1.4	1,190.00
10/13/23	OB	REPEATEDLY EMAIL AND CALL COUNSEL FOR NET WINNER REGARDING RECEIVERSHIP CLAIMS; EMAIL AND CALL RECEIVER REGARDING SAME.	1.1	935.00

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File Number OB	S1485-4	DAVID P. STAPLETON ZADEH LIQUIDATION AND RECOVERY	10/31/23 1251276-002 Page 2	
Date	Tkpr	Description of Services Rendered	Hours	Amount
10/13/23	DPL	REVIEW AND ANALYZE LETTER FROM WARD GREENE WITH COUNTEROFFER FOR SETTLEMENT; REVIEW AND ANALYZE SUMMARY OF PAYMENTS FROM OLIVIA JONES AND POTENTIAL CREDITS FOR SAME; EMAILS WITH OREN BITAN AND WILL MILLER REGARDING POTENTIAL COUNTEROFFERS; REVIEW DETAILED REPORT OF PAYMENTS FROM WARD GREENE.	.6	405.00
10/16/23	DPL	REVIEW AND ANALYZE EMAIL AND REPORT FROM [REDACTED]; EMAILS WITH OLIVIA JONES REGARDING SAME AND EFFECT OF ANALYSIS PROVIDED BY COUNSEL FOR NO CONTEST; REVIEW ANALYSIS FROM OPPOSING COUNSEL; REVIEW EMAILS CONCERNING SERVICE OF COMPLAINTS AND SUMMONS.	.8	540.00
10/16/23	TDE	REVIEW FILED COMPLAINTS; BEGIN DRAFT OF MASTER CASE TRACKING LIST.	1.5	390.00
10/17/23	DPL	EMAILS WITH [REDACTED] [REDACTED] EMAILS WITH OREN BITAN REGARDING POTENTIAL SETTLEMENT COUNTEROFFER.	.4	270.00
10/17/23	PE	DRAFT REQUESTS FOR ADMISSION AND PRODUCTION TO NET WINNERS (2.70)	2.7	1,107.00
10/18/23	OB	REVIEW CORRESPONDENCE AND ACCOUNTING FROM SEVERAL NET WINNERS REGARDING SETTLEMENT OFFERS; CALL AND EMAIL RECEIVER REGARDING SAME; EMAIL COUNSEL FOR NET WINNERS REGARDING SAME.	1.8	1,530.00
10/18/23	DPL	EMAILS WITH [REDACTED] [REDACTED] INCLUDING PAYPAL DATA; REVIEW NOTICE OF INTENT TO CONDUCT BULK SALE; REVIEW EMAIL FROM COUNSEL FOR LEAD BANK REGARDING SAME AND REQUEST FOR STATUS REPORT.	.2	135.00
10/18/23	PE	MEETING WITH CLIENT RE [REDACTED] (.30)	.3	123.00
10/19/23	OB	STRATEGIZE REGARDING SETTLEMENT OFFER FROM NET WINNERS; REVIEW DOCUMENTS REGARDING SAME; EMAIL COUNSEL FOR NET WINNERS REGARDING SAME.	1.3	1,105.00
10/19/23	DPL	EMAILS WITH OREN BITAN AND OLIVIA JONES CONCERNING POTENTIAL [REDACTED] INCLUDING TERMS OF OFFER AND RELEVANT PARTIES; REVIEW TERMS OF PRIOR OFFER FROM [REDACTED]; DRAFT AND REVISE COUNTEROFFER TO [REDACTED]; CONFIRM TERMS OF SAME WITH MR. BITAN; REVIEW EMAIL FROM ENIN POKUAA REGARDING COMPLAINT AGAINST ADEN TRANO AND [REDACTED].	.7	472.50
10/19/23	PE	PREPARE NEW SPREADSHEET TRACKING HISTORY AND COMMUNICATIONS WITH VARIOUS NET WINNERS AND THEIR COUNSELS (2.90)	2.9	1,189.00
10/23/23	DPL	EMAILS WITH OREN BITAN REGARDING CALL WITH LEAD BANK; EMAILS WITH THERESA DIRA REGARDING SUMMARY CHART OF CASE FILINGS AND POTENTIAL SERVICE; REVIEW DRAFT CHART OF SAME; EMAILS WITH ASSISTANT AND MS. DIRA REGARDING SERVICE ON DEFENDANTS AND ADDITIONAL COMPLAINTS FOR FILING.	.5	337.50
10/23/23	TDE	COMBINE MASTER CASE TRACKING LIST WITH SETTLEMENT STATUS TRACKING CHART PREPARED BY P. ENIN.	.8	208.00
10/23/23	PE	VERIFY ADDRESSES FOR SERVICE OF FILED COMPLAINTS (.60)	.6	246.00
10/24/23	OB	PREPARE FOR AND CALL LEAD BANK REGARDING BULK SALES AND POTENTIAL SETTLEMENT OF BANK CLAIM; CALL RECEIVER REGARDING SAME.	.6	510.00
10/24/23	OB	REVIEW DOCUMENTS PRODUCED BY NET WINNERS; ANALYZE SAME; STRATEGIZE REGARDING POTENTIAL SETTLEMENT OFFER OF SAME; CALL AND EMAIL RECEIVER REGARDING SAME.	.7	595.00



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Date	Tkpr	Description of Services Rendered	Hours	Amount
10/24/23	DPL	EMAILS WITH OREN BITAN AND POKUAA ENIN REGARDING [REDACTED], AS WELL AS TRACKING OF COMPLAINTS FILED, COMPLAINTS SERVED, AND NEGOTIATIONS ON [REDACTED]; CONFER WITH THERESA DIRA AND ASSISTANT REGARDING SAME AND POTENTIAL ACCEPTANCE OF SERVICE; REVIEW STATUS OF CASES; EMAILS WITH LITIGATION TEAM REGARDING DISCOVERY REQUESTS TO SERVE WITH COMPLAINTS; EMAILS WITH LITIGATION REGARDING EVIDENCE TO SHOW [REDACTED].	.9	607.50
10/24/23	PE	DRAFT DISCOVERY REQUESTS TO ANTHONY VARELA (1.40)	1.4	574.00
10/25/23	OB	EMAIL COUNSEL FOR PAYPAL REGARDING DOCUMENT REQUESTS; REVIEW DATA PRODUCED BY NET WINNER FOR PRE-RECEIVERSHIP PAYMENTS; EMAIL RECEIVER REGARDING SAME; ANALYZE SAME.	.8	680.00
10/25/23	DPL	EMAILS WITH LITIGATION TEAM REGARDING SERVICE OF COMPLAINTS AND PLAN FOR REQUEST TO ACCEPT SERVICE IF REPRESENTED BY COUNSEL; CONFER WITH ASSISTANT REGARDING CONSOLIDATING AND UPDATING CHART SUMMARIZING NEGOTIATIONS AND STATUS OF CASES.	.4	270.00
10/26/23	OB	PREPARE FOR AND ATTEND CALL WITH COUNSEL FOR PAYPAL REGARDING DOCUMENT REQUESTS; EMAIL RECEIVER REGARDING SAME.	.8	680.00
10/26/23	PE	DOCUMENT SETTLEMENT NEGOTIATION HISTORY WITH NET WINNERS (1.40)	1.4	574.00
10/27/23	OB	REVIEW AND ANALYZE SETTLEMENT OFFER BY LEAD BANK; EMAIL RECEIVER REGARDING SAME; STRATEGIZE REGARDING SAME.	.8	680.00
10/27/23	OB	REVIEW DISCOVERY TO BE PROPOUNDED TO NET WINNERS; STRATEGIZE REGARDING SAME; EMAIL RECEIVER REGARDING SAME; STRATEGIZE REGARDING PENDING SETTLEMENT PROPOSALS OF SAME.	1.2	1,020.00
10/27/23	DPL	REVIEW AND ANALYZE EMAIL FROM WARD GREENE REGARDING SETTLEMENT OFFER; EMAILS WITH LITIGATION TEAM REGARDING SAME AND POTENTIAL RESPONSE TO SAME	.3	202.50
10/30/23	WMM	EMAIL CORRESPONDENCE RE TWENTY-TWO SHOES COMPLAINT AND RELATED ISSUES.	.3	210.00
10/30/23	DPL	REVIEW REPORT FROM CT CORP REGARDING SERVICE ATTEMPT AND INABILITY TO SERVE; EMAILS WITH LITIGATION TEAM REGARDING SERVICE ON TWENTY-TWO SHOES, AS WELL AS [REDACTED]; EMAILS WITH LITIGATION TEAM REGARDING REQUESTS TO COUNSEL FOR DEFENDANTS TO ACCEPT SERVICE; REVIEW PRIOR CORRESPONDENCE WITH COUNSEL FOR TWENTY-TWO SHOES; EMAILS WITH PARALEGAL TO OBTAIN ADDITIONAL INFORMATION ABOUT LLC AND REGISTERED AGENT; EMAILS WITH LITIGATION TEAM REGARDING EXHAUSTION OF SETTLEMENT DISCUSSIONS; EMAILS WITH LITIGATION TEAM REGARDING MODIFICATIONS TO DISCOVERY REQUESTS AND AMENDMENT OF COMPLAINT.	1.1	742.50
10/30/23	JMA	RESEARCH TWENTY-TWO SHOES LLC AND OBTAIN ENTITY INFORMATION SAME; EMAIL CORRESPONDENCE WITH DAN LARSEN REGARDING SAME.	.3	72.00
10/30/23	PE	EMAILS AND RESEARCH RE SERVICE FOR TWENTY TWO SHOES LLC (.30)	.3	123.00
10/31/23	OB	STRATEGIZE REGARDING SETTLEMENT OFFERS OF NET WINNERS; REVIEW SETTLEMENT OFFER OF LEAD BANK; EMAIL AND CALL RECEIVER REGARDING SAME.	1.2	1,020.00
10/31/23	DPL	REVIEW AND ANALYZE AMENDED COMPLAINT AGAINST TWENTY TWO SHOES; EMAILS WITH LITIGATION TEAM REGARDING SAME AND POTENTIAL REVISIONS		

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File Number OB S1485-4 DAVID P. STAPLETON ZADEH LIQUIDATION AND RECOVERY 10/31/23 1251276-002 Page 4

Date	Tkpr	Description of Services Rendered	Hours	Amount
		TO DISCOVERY REQUESTS; REVIEW NOTICE OF BULK SALE AS WELL AS RESPONSE FROM LEAD BANK.	.5	337.50

Date	Description of Disbursement	CheckNo	Units	Amount
10/01/23	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY ENIN,POKUAA ON 09/01/23	605079		21.63
10/01/23	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY ENIN,POKUAA ON 09/12/23	605079		21.63
10/01/23	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY ENIN,POKUAA ON 09/21/23	605079		30.85
10/02/23	PROCESS SERVICE ABC LEGAL SERVICES, LLC FEE FOR SERVICE ON TWENTY-TWO SHOES, INC. - INV # 15224259.100	604868		129.00
10/26/23	FILING FEES CITIBUSINESS CARD COMPLAINT AGAINST TWENTY-TWO SHOES			594.00
10/29/23	PROCESS SERVICE ABC LEGAL SERVICES, LLC SERVICE ON JOHNNY DAVIS RE SUMMONS, COMPLAINT AND DISCOVERY REQUESTS - INV.# 15460674.100			129.00
10/31/23	OTHER: RELATIVITY ODA LLC 'MONTHLY RELATIVITY CHARGES FOR DATABASE HOSTING ELECTRONIC DISCOVERY			121.00

Recap of Services	Hours	Effective Rate	Fees
WILLIAM M. MILLER	.6	700.00	420.00
OREN BITAN	19.7	850.00	16,745.00
DANIEL P. LARSEN	9.7	675.00	6,547.50
JOY AIKIN	.3	240.00	72.00
THERESA DIRA	2.3	260.00	598.00
POKUAA ENIN	12.7	410.00	5,207.00
<b>Total</b>	<b>45.3</b>		<b>29,589.50</b>

**Total Fees** 29,589.50  
**Total Disbursements** 1,047.11

**Matter Total** \$ 30,636.61



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Date	Tkpr	Description of Services Rendered	Hours	Amount
11/01/23	OB	REVIEW SUBPOENA ISSUED TO RECEIVER FOR DOCUMENTS REGARDING CHARGEBACKS AND TRANSACTIONS WITH AMERICAN EXPRESS; STRATEGIZE REGARDING SAME; EMAIL RECEIVER REGARDING SAME.	.4	340.00
11/01/23	OB	REVIEW CORRESPONDENCE FROM COUNSEL FOR MULTIPLE NET WINNERS; RESPOND TO SAME; STRATEGIZE REGARDING SAME; EMAIL RECEIVER REGARDING SAME.	1.4	1,190.00
11/01/23	DPL	REVIEW EMAIL FROM COUNSEL FOR AMERICAN EXPRESS REGARDING OBJECTIONS TO SUBPOENA; EMAILS WITH LITIGATION TEAM REGARDING SAME AND SCOPE OF DOCUMENT REQUESTS FOR SUBPOENA.	.3	202.50
11/02/23	DPL	CONFER WITH EMILY WARD CONCERNING ARBITRATION BETWEEN SIARA'S SNEAKERS AND AMEX, IN RELATION TO SHIPPING AND PAYMENT RECORDS AVAILABLE THROUGH THE RECEIVERSHIP; REVIEW EMAIL FROM EMILY WARD REGARDING SAME; REVIEW AND ANALYZE DOCUMENT REQUESTS IN SUBPOENA; EMAILS WITH LITIGATION TEAM REGARDING SAME AND POTENTIAL OBJECTIONS TO SAME; REVIEW AND ANALYZE LAW CONCERNING RIGHT TO PRE-HEARING DISCOVERY IN ARBITRATION; EMAIL LITIGATION TEAM REGARDING LIMITATIONS ON SAME	2.2	1,485.00
11/02/23	PE	REVIEW RECEIVER'S REPORT AND REVISE SECTION REGARDING LITIGATION (.60); EDIT CHART (.10)	.7	287.00
11/03/23	WMM	EMAIL CORRESPONDENCE AND ANALYSIS OF PENDING POTENTIAL SETTLEMENTS OF CLAW BACK ACTIONS; ISSUES RE SERVICE OF PENDING LAWSUITS; TELEPHONE CONFERENCE WITH MR. CONOR RICHARD'S COUNSEL RE SETTLEMENT OFFER.	.6	420.00
11/03/23	DPL	EMAILS WITH LITIGATION TEAM REGARDING POTENTIAL RESPONSE TO SUBPOENA AND WHETHER TO OBJECT; EMAILS WITH LITIGATION TEAM REGARDING [REDACTED]; EMAILS WITH OREN BITAN REGARDING [REDACTED] AS WELL AS STATUS OF SERVICE ON OTHER FILED COMPLAINTS; ANALYZE [REDACTED]; EMAILS WITH LITIGATION TEAM REGARDING [REDACTED]; EMAILS WITH WILL MILLER REGARDING SETTLEMENT WITH [REDACTED]; EMAILS WITH POKUAA ENIN REGARDING PROPER PARTY FOR SERVICE AND STATUS OF COMPLAINTS; REVIEW REPORTS FROM [REDACTED]	1.4	945.00
11/03/23	TDE	RESEARCH AT NEW JERSEY SECRETARY OF STATE WEBSITE FOR SOULSERIOUSS REGISTERED AGENT.	.3	78.00
11/03/23	PE	REVIEW ARBITRATION DOCUMENTS RE SIARA SNEAKERS (.20); REVIEW COMMUNICATIONS RE TRENDZ, UPDATE CHART (.40); RESEARCH SERVICE FOR SOLESERIOUSS (.90); DRAFT DISCOVERY TO DEADSTOCK AND HALAVI (.90)	2.4	984.00
11/06/23	OB	REVIEW AND REVISE RECEIVER'S MONTHLY REPORT; EMAIL RECEIVER REGARDING SAME.	.4	340.00
11/06/23	OB	REVIEW SUBPOENA TO BE ISSUED TO RECEIVER REGARDING CHARGEBACK CLAIM; EMAIL RECEIVER REGARDING SAME.	.4	340.00
11/06/23	OB	REPEATEDLY EMAIL COUNSEL FOR MULTIPLE NET WINNERS REGARDING POTENTIAL RESOLUTION; REVIEW DOCUMENTS PRODUCED BY NET WINNERS IN SUPPORT OF SAME; EMAIL RECEIVER REGARDING SAME.	.9	765.00





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Date	Tkpr	Description of Services Rendered	Hours	Amount
11/06/23	DPL	REVIEW MESSAGE FROM COUNSEL FOR JOHNNY DAVIS; EMAILS WITH COUNSEL FOR JOHNNY DAVIS REGARDING SAME; EMAILS WITH LITIGATION TEAM REGARDING POTENTIAL NEGOTIATION RELATING TO SAME; EMAILS WITH LITIGATION TEAM REGARDING SUBPOENA FOR RECORDS AND SCOPE OF AVAILABLE DOCUMENTS; EMAIL LITIGATION TEAM REGARDING NEGOTIATIONS WITH THE AUTHENTIC AND SUPPORT FOR POTENTIAL DAMAGES.	.8	540.00
11/06/23	PE	REVIEW COMMUNICATIONS WITH CLIENTS AND NET WINNERS COUNSEL, PREPARE UPDATES AND OUTSTANDING ACTION ITEMS(1.30)	1.3	533.00
11/07/23	WMM	TELEPHONE CONFERENCE RE CLAWBACK SUITS AND SETTLEMENT; DISCUSSION RE SUBMITTING MOTION ON CLAW BACK SETTLEMENTS; STRATEGIZE RE SUBPEONA RESPONSE IN AMERICAN EXPRESS LAWSUIT.	.6	420.00
11/07/23	OB	REPEATEDLY EMAIL MULTIPLE NET WINNERS REGARDING POTENTIAL RESOLUTION; REVIEW DOCUMENTS REGARDING SAME; EMAIL RECEIVER REGARDING SAME.	.7	595.00
11/07/23	DPL	EMAILS WITH LITIGATION TEAM REGARDING POTENTIAL RESPONSE AND OBJECTIONS TO SUBPOENA, AS WELL SHOPIFY RECORDS; EMAILS WITH LITIGATION TEAM REGARDING SUPPORTING DATA AND DETAIL FOR CLAIM AGAINST TWENTY-TWO SHOES; EMAILS WITH JOHN RIZZARDI CONCERNING POTENTIAL SETTLEMENT DISCUSSIONS RELATING TO JOHNNY DAVIS; REVIEW SPREADSHEET OF CASE ACTIVITY AND SETTLEMENT NEGOTIATIONS TO DETERMINE UPDATES FOR SAME.	.9	607.50
11/07/23	PE	REDACT INVOICE (.20); INTERNAL MEETING (.20)	.4	164.00
11/08/23	WMM	REVIEW SETTLEMENT OFFERS RE CLAWBACK SUITS; STRATEGIZE RE FILING A REMAINING ACTIONS AND RELATED ISSUES	.5	350.00
11/08/23	OB	CALL COUNSEL FOR NET WINNER REGARDING POTENTIAL SETTLEMENT; EMAIL RECEIVER REGARDING SAME.	.4	340.00
11/08/23	OB	REVIEW SETTLEMENT OFFER BY NET WINNER; DRAFT RESPONSE TO SAME; REVIEW DOCUMENTS REGARDING SAME; EMAIL COUNSEL FOR NET WINNER REGARDING SAME; EMAIL RECEIVER REGARDING SAME.	.6	510.00
11/08/23	OB	REVIEW SUBPOENA ISSUED TO RECEIVER FOR DOCUMENTS REGARDING CHARGEBACKS AND TRANSACTIONS WITH AMERICAN EXPRESS; STRATEGIZE REGARDING SAME; EMAIL RECEIVER REGARDING SAME.	.3	255.00
11/08/23	DPL	CONFER WITH OREN BITAN REGARDING COMMUNICATIONS WITH NET WINNERS, POTENTIAL NEW CASE FILINGS, SERVICE OF FILED CASES, MAINTENANCE OF STATUS SPREADSHEET, AND POTENTIAL RESPONSE TO SUBPOENA; EMAIL LITIGATION TEAM REGARDING COORDINATION OF EFFORTS AND SHARING INFORMATION; CONFERENCE WITH MR. BITAN AND COUNSEL FOR JOHNNY DAVIS REGARDING POTENTIAL CLAIMS AND NEGOTIATION; BEGIN TO PREPARE SETTLEMENT AGREEMENT FORM, AS WELL AS MOTION FOR APPROVAL OF SAME; EMAIL OLIVIA JONES AND JAKE DIORIO REGARDING ADDITIONAL DATA RELATING TO TWENTY-TWO SHOES.	1.1	742.50
11/08/23	PE	VERIFY NET WINNER SERVICE ADDRESS AND REVIEW COMPLAINT FOR SERVICE (.20); DRAFT REQUESTS FOR ADMISSIONS TO NET WINNER (.50)	.7	287.00
11/09/23	WMM	REVIEW REMAINING CLAW BACK LAWSUITS AND STATUTE OF LIMITATIONS ISSUES; EMAIL CORRESPONDENCE RE SAME; EMAIL CORRESPONDENCE RE SUBPOENA RESPONSE AND RELATED ISSUES	.8	560.00
11/09/23	OB	CALL COUNSEL FOR E. HALAVI REGARDING NET WINNER COMPLAINT; EMAIL		





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Date	Tkpr	Description of Services Rendered	Hours	Amount
11/09/23	DPL	RECEIVER REGARDING SAME; STRATEGIZE REGARDING SAME. EMAILS WITH JAKE DIORIO AND OLIVIA JONES REGARDING [REDACTED] [REDACTED] AND NET WINNER ANALYSIS; EMAILS WITH EMILY WARD REGARDING SUBPOENA; EMAILS WITH POKUAA ENIN REGARDING COMPLAINTS TO FILE AND SETTLEMENT NEGOTIATIONS.	.6	510.00
11/09/23	PE	DRAFT DISCOVERY TO NET WINNERS (.50); REVIEW ACCOUNTING FOR NETWINNERS TO DETERMINE [REDACTED], EMAIL TEAM WITH RECOMMENDATIONS RE SAME (1.60)	.6	405.00
11/10/23	WMM	TELEPHONE CONFERENCE WITH TEAM REGARDING CLAW BACK LAWSUITS AND SETTLEMENTS; EMAIL CORRESPONDENCE RE SAME; REVIEW AND ANALYSIS OF NEW DATA RE POTENTIAL SETTLEMENT; REVIEW ADDITIONAL CLAW BACK COMPLIANT TO BE FILED.	2.1	861.00
11/10/23	OB	CALL E. WARD REGARDING SUBPOENA ISSUED TO RECEIVER REGARDING PENDING ARBITRATION REGARDING CHARGEBACKS; EMAIL RECEIVER REGARDING SAME.	1.7	1,190.00
11/10/23	OB	PREPARE FOR AND CALL RECEIVER REGARDING STATUS OF NET WINNER COMPLAINTS, STATUS OF LEAD BANK NEGOTIATIONS, AND SUBPOENA REGARDING CHARGEBACKS; STRATEGIZE REGARDING SAME.	.6	510.00
11/10/23	OB	REVIEW FINALIZED COMPLAINTS AND DISCOVERY AGAINST NET WINNERS; EMAIL AND CALL RECEIVER REGARDING SAME; FINALIZE AND FILE SAME.	.7	595.00
11/10/23	DPL	CONFER WITH LITIGATION TEAM REGARDING RESPONSE TO SUBPOENA, RESPONSE TO WARD GREENE, STATUS OF SETTLEMENT NEGOTIATIONS, AND PLAN FOR ADDITIONAL CASES TO BE FILED; EMAILS WITH WARD GREENE REGARDING ADDITIONAL INFORMATION TO EVALUATE CLAIM AGAINST NO CONTEST; EMAILS WITH EMILY WARD REGARDING SUBPOENA TO RECEIVER; CONFER WITH EMILY WARD AND OREN BITAN REGARDING SAME AND INFORMATION TO PROVIDE; EMAIL JAKE DIORIO AND OLIVIA JONES FOR DATA TO SHARE WITH EMILY WARD.	1.4	1,190.00
11/10/23	PE	REVIEW COMMUNICATIONS WITH NET WINNERS COUNSEL, UPDATE CHART ACCORDINGLY (.20); MEETING WITH CLIENT RE STATUS OF NET WINNERS (.50); DRAFT DISCOVERY TO NET WINNERS (2.10)	1.7	1,147.50
11/13/23	OB	EMAIL COUNSEL FOR NET WINNER J. DAVIS REGARDING STATUS OF CASE AND DISCOVERY; EMAIL RECEIVER REGARDING SAME; REVIEW CORRESPONDENCE REGARDING SAME.	2.8	1,148.00
11/13/23	OB	REPEATEDLY EMAIL COUNSEL FOR NET WINNERS REGARDING POTENTIAL RESOLUTION; EMAIL RECEIVER REGARDING SAME; REVIEW DOCUMENTS REGARDING SAME.	.4	340.00
11/13/23	DPL	REVIEW EMAIL FROM JOHN RIZZARDI REGARDING REPRESENTATION OF JOHNNY DAVIS; EMAILS WITH LITIGATION TEAM REGARDING SAME AND SERVICE OF DISCOVERY REQUESTS TO SAME; REVIEW LETTER TO JOHNNY DAVIS WITH SUPPORTING DATA FOR CLAIMS; EMAILS WITH OLIVIA JONES AND JAKE DIORIO REGARDING GATHERING DOCUMENTS FOR ARIZONA COUNSEL IN RELATION TO SUBPOENA; MODIFY STIPULATED PROTECTIVE ORDER FOR ARIZONA COUNSEL; EMAILS WITH OREN BITAN REGARDING POTENTIAL SETTLEMENT NEGOTIATIONS AND AGREEMENTS WITH SELECT NET WINNERS; CONTINUE TO ANALYZE SETTLEMENT TERMS AND [REDACTED] [REDACTED]; CONTINUE DRAFTING SAME.	.8	680.00
11/14/23	WMM	REVIEW AND ANALYSIS OF TEMPLATE SETTLEMENT AGREEMENT FOR CLAW	1.8	1,215.00



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Date	Tkpr	Description of Services Rendered	Hours	Amount
11/14/23	OB	BACK ACTIONS; REVIEW EMAIL CORRESPONDENCE RE OTHER POTENTIAL SETTLEMENT AND SERVICE ISSUES.	.6	420.00
11/14/23	DPL	REVIEW AND REVISE DRAFT SETTLEMENT AGREEMENT WITH NET WINNER; EMAIL RECEIVER REGARDING SAME.	.6	510.00
11/15/23	OB	CONTINUE ANALYZING TERMS OF PROPOSED SETTLEMENT AGREEMENT AND DRAFTING SAME, INCLUDING TOLLING AGREEMENT PROVISION; REVIEW TERMS OF RECEIVERSHIP ORDER AND COMPLAINTS TO MODIFY SETTLEMENT AGREEMENT; EMAIL LITIGATION TEAM REGARDING DRAFT OF SAME AS UNIVERSAL TEMPLATE FOR SAME.	2.3	1,552.50
11/15/23	DPL	REPEATEDLY EMAIL COUNSEL FOR NET WINNERS REGARDING POTENTIAL RESOLUTION; EMAIL RECEIVER REGARDING SAME.	.8	680.00
11/15/23	PE	REVIEW EMAIL FROM EMILY WARD REGARDING REQUEST FOR DOCUMENTS; EMAIL OLIVIA JONES AND JAKE DIORIO REGARDING REQUESTS FOR CATEGORIES OF DOCUMENTS; EMAILS WITH OREN BITAN AND WILL MILLER REGARDING POTENTIAL MODIFICATIONS TO SETTLEMENT AGREEMENT [REDACTED]; EMAILS WITH POKUAA ENIN REGARDING SERVICE ON SOULSERIOUS AND OPTIONS FOR SAME.	.7	472.50
11/16/23	WMM	REVIEW COMMUNICATIONS, SETTLEMENT DRAFTS, UPDATE STATUS CHART (.60)	.6	246.00
11/16/23	OB	EMAIL CORRESPONDENCE RE STATUS OF SERVICE, SETTLEMENTS AND REVIEW CHANGES TO FORM SETTLEMENT AGREEMENT.	.5	350.00
11/16/23	OB	MEET AND CONFER WITH COUNSEL FOR MULTIPLE NET WINNERS; EMAIL RECEIVER REGARDING SAME.	.7	595.00
11/16/23	DPL	PREPARE FOR AND CALL COUNSEL FOR LEAD BANK REGARDING POTENTIAL SETTLEMENT; EMAIL RECEIVER REGARDING SAME.	.6	510.00
11/17/23	OB	REVISE SETTLEMENT AGREEMENT; EMAILS WITH OREN BITAN AND WILL MILLER REGARDING SAME; EMAILS WITH JOHN RIZZARDI REGARDING EXTENSION ON RESPONDING TO COMPLAINT TO ALLOW FOR SETTLEMENT NEGOTIATIONS.	.8	540.00
11/17/23	DPL	REPEATEDLY COMMUNICATE WITH COUNSEL FOR NET WINNERS REGARDING PENDING ACTIONS AND POTENTIAL RESOLUTION; EMAIL RECEIVER REGARDING SAME.	.8	680.00
11/19/23	DPL	EMAILS WITH OREN BITAN, JAKE DIORIO AND OLIVIA JONES REGARDING DOCUMENTS TO PRODUCE; REVIEW LETTER REGARDING SHAHED PARTIES REQUESTING PRODUCTION OF DOCUMENTS; EMAIL MR. BITAN REGARDING SAME.	.3	202.50
11/20/23	OB	EMAILS WITH JAKE DIORIO AND OLIVIA JONES REGARDING DOCUMENTS TO PROVIDE IN RESPONSE TO SUBPOENA AND PROTECTIVE ORDER.	.2	135.00
11/20/23	OB	REVIEW AND REVISE DRAFT SETTLEMENT AGREEMENT WITH NET WINNERS; EMAIL RECEIVER REGARDING SAME; STRATEGIZE REGARDING SETTLEMENT OF SAME.	.8	680.00
11/20/23	DPL	STRATEGIZE REGARDING RECEIVER'S RESPONSE TO THIRD PARTY SUBPOENA AND PRODUCTION OF DOCUMENTS.	.4	340.00
		EMAILS WITH JAKE DIORIO AND OLIVIA JONES REGARDING PRODUCTION OF DOCUMENTS FOR SUBPOENA AND ADDITIONAL SEARCH TERMS; PREPARE CERTIFICATION FOR EMILY WARD FOR STIPULATED PROTECTIVE ORDER; EMAIL EMILY WARD REGARDING EXECUTION OF STIPULATED PROTECTIVE ORDER BEFORE RECEIPT OF DOCUMENTS.	.6	405.00



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File Number OB	S1485-4	DAVID P. STAPLETON ZADEH LIQUIDATION AND RECOVERY	11/30/23 1262139 5	
			Page	
Date	Tkpr	Description of Services Rendered	Hours	Amount
11/21/23	DPL	EMAILS WITH OLIVIA JONES REGARDING PRODUCTION OF DOCUMENTS TO EMILY WARD IN RELATION TO SUBPOENA, AS WELL AS REVIEW OF SAME; EMAILS WITH EMILY WARD REGARDING STIPULATED PROTECTIVE ORDER AND PRODUCTION OF DOCUMENTS.	.4	270.00
11/22/23	DPL	REVIEW EMAIL AND SPREADSHEET FROM NO CONTEST REGARDING CALCULATION OF NET WINNER AMOUNT AND SETTLEMENT OFFER; EMAIL OLIVIA JONES AND JAKE DIORIO REGARDING SAME IN RELATION TO DATA FROM RECEIVER.	.4	270.00
11/27/23	WMM	EMAIL CORRESPONDENCE RE CLAW BACK LAWSUITS AND PENDING SETTLEMENTS; EMAIL CORRESPONDENCE WITH SNEAKSALE COUNSEL RE POTENTIAL SETTLEMENT; ANALYSIS RE SAME; TELEPHONE CONFERENCE WITH RECEIVER RE SAME.	1.2	840.00
11/27/23	OB	CALL AND EMAIL COUNSEL FOR MULTIPLE NET WINNERS REGARDING POTENTIAL RESOLUTION; CALL RECEIVER REGARDING SAME; ANALYZE DOCUMENTS REGARDING SAME.	1.3	1,105.00
11/27/23	DPL	REVIEW EMAILS FROM COUNSEL REGARDING CONSENT TO STIPULATED PROTECTIVE ORDER; EMAILS WITH WILL MILLER AND POKUAA ENIN REGARDING STATUS OF COMPLAINTS AND NEXT STEPS CONCERNING FILING OR SETTLEMENT; EMAILS WITH OLIVIA JONES CONCERNING ANALYSIS OF [REDACTED]; BEGIN TO REVIEW DOCUMENTS TO PRODUCE TO SIARA'S SNEAKERS RELATING TO SUBPOENA; EMAILS WITH POKUAA ENIN AND OREN BITAN REGARDING ADDITIONAL INFORMATION REQUESTED BY ROBERT LEVY; EMAIL LITIGATION TEAM REGARDING UPDATES TO STATUS OF SERVICE AND SETTLEMENT NEGOTIATIONS.	1.3	877.50
11/27/23	PE	UPDATE STATUS OF SETTLEMENT POSTURES WITH NET WINNERS (.20)	.2	82.00
11/28/23	OB	REPEATEDLY EMAIL AND CALL COUNSEL FOR NET WINNERS; REVIEW DOCUMENTS AND ACCOUNTING ANALYSIS REGARDING SAME; EMAIL AND CALL RECEIVER REGARDING SAME.	1.8	1,530.00
11/28/23	DPL	EMAILS WITH LITIGATION TEAM REGARDING PRODUCTION OF DOCUMENTS IN RESPONSE TO SUBPOENA; EMAILS WITH OREN BITAN REGARDING COMPLAINT AGAINST MYTHS NYC; EMAILS WITH LITIGATION TEAM REGARDING AMEX STATEMENTS.	.3	202.50
11/28/23	TDE	DOWNLOAD SIARA SNEAKERS DOCUMENTS; INDEX TO L DRIVE; EMAIL TO D. LARSEN WITH LINK.	.3	78.00
11/29/23	DPL	EMAILS WITH LITIGATION TEAM REGARDING FINAL VERSION OF COMPLAINT AGAINST MYTHS NYC, AND PLAN FOR FURTHER FILING.	.2	135.00
11/29/23	PE	REVIEW COMPLAINTS TO FILE AGAINST NET WINNER (.40)	.4	164.00
11/30/23	DPL	CONFERENCE WITH OREN BITAN AND COUNSEL FOR POTENTIAL BUYER OF ASSET OF RECEIVERSHIP ESTATE; CONFER WITH MR. BITAN REGARDING SAME; EMAILS WITH LITIGATION TEAM REGARDING REVIEW OF STATUS OF LITIGATION EFFORTS.	.6	405.00
11/30/23	PE	REVIEW COMMUNICATIONS WITH CLIENT AND NET WINNERS COUNSEL, UPDATE CHART ACCORDINGLY (.20)	2	82.00

Date	Description of Disbursement	CheckNo	Units	Amount
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File Number OB	S1485-4	DAVID P. STAPLETON ZADEH LIQUIDATION AND RECOVERY	11/30/23 1262139 6
Date	Description of Disbursement	CheckNo	Units Amount
10/30/23	PROCESS SERVICE ABC LEGAL SERVICES, LLC ATTEMPTED SERVICE TO ANTHONY VARELA (DAVIE, FL) - INV # 15470316.100	606090	129.00
11/03/23	PROCESS SERVICE ABC LEGAL SERVICES, LLC ATTEMPTED SERVICE ON SOULSERIOUSS LLC - INV # 15506982.100	605475	129.00
11/09/23	PROCESS SERVICE ABC LEGAL SERVICES, LLC SERVICE ON ANTHONY VARELA - INV # 15562843.100	606090	129.00
11/09/23	PROCESS SERVICE ABC LEGAL SERVICES, LLC ATTEMPTED SERVICE TO SOULSERIOUSS LLC - INV # 15556594.100	606090	129.00
11/10/23	FILING FEES CITIBUSINESS CARD NEW JERSEY ENTITY REPORT FOR TWENTY-TWO SHOES LLC		.03
11/10/23	FILING FEES CITIBUSINESS CARD COMPLAINT FILING FEE AGAINST DEADSTOCK AND HALAVI		594.00
11/10/23	FILING FEES CITIBUSINESS CARD FILING FEE FOR COMPLAINT FILED AGAINST ANTHONY VARELA		594.00
11/10/23	FILING FEES CITIBUSINESS CARD FILING FEE FOR COMPLAINT FILED AGAINST ADEN TRANO		594.00
11/10/23	FILING FEES CITIBUSINESS CARD FILING FEE FOR COMPLAINT FILED AGAINST JOHNNY DAVIS		594.00
11/10/23	FILING FEES CITIBUSINESS CARD FILING FEE FOR COMPLAINT FILED AGAINST KEYSTONE MARKET		594.00
11/10/23	FILING FEES CITIBUSINESS CARD FILING FEE FOR COMPLAINT FILED AGAINST SOULSERIOUSS		594.00
11/10/23	FILING FEES CITIBUSINESS CARD FILING FEE FOR COMPLAINT FILED AGAINST KICKSTOPNY LLC		594.00
11/10/23	FILING FEES CITIBUSINESS CARD FILING FEE FOR COMPLAINT FILED AGAINST NO CONTEST LLC		594.00
11/14/23	PROCESS SERVICE ABC LEGAL SERVICES, LLC ATTEMPTED SERVICE TO TWENTY-TWO SHOES (BRICK TOWNSHIP NJ) - INV # 15593063.100	606090	129.00
11/17/23	PROCESS SERVICE ABC LEGAL SERVICES, LLC ATTEMPTED SERVICE TO THE SNEAK PEEK - INV # 15631375.100	606090	136.74
11/27/23	PROCESS SERVICE ABC LEGAL SERVICES, LLC ATTEMPTED SERVICE TO THE SNEAK PEEK - INV # 15689995	606090	136.74
11/30/23	OTHER: RELATIVITY ODA LLC 'MONTHLY RELATIVITY CHARGES FOR DATABASE HOSTING ELECTRONIC DISCOVERY		121.00

Recap of Services	Hours	Effective Rate	Fees
WILLIAM M. MILLER	6.5	700.00	4,550.00
OREN BITAN	17.8	850.00	15,130.00
DANIEL P. LARSEN	18.9	675.00	12,757.50
THERESA DIRA	.6	260.00	156.00
POKUAA ENIN	11.8	410.00	4,838.00
<b>Total</b>	<b>55.6</b>		<b>37,431.50</b>

**Total Fees** 37,431.50  
**Total Disbursements** 5,791.51

**Matter Total** \$ 43,223.01



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October 31, 2023

**Zadeh Kicks, LLC**

**Invoice Number: 6964**  
 Invoice Period: 10-01-2023 - 10-31-2023

### Time Details

Date	Timekeeper	Description	Hours	Amount
10-02-2023	CS	Create NDA and forward same to JD. Order Uline and T/C w/ C. Johnson re: check-in. Check pricing on all personal shoes re-listed by warehouse team. Check disputes, messages and recent orders.	3.30	957.00
10-02-2023	DB	Process incoming mail.	0.10	16.00
10-02-2023	JD	T/C w/ bulk buyer. Plan next sale.	0.40	196.00
10-02-2023	JD	Updates w/ CP re: exhibits for report and summary of sales.	0.30	147.00
10-02-2023	OJ	Set up sharefile for Trendz support.	0.40	130.00
10-02-2023	CS	Evaluate bulk offer and forward same to JD.	2.20	638.00
10-03-2023	AR	Process ACH payments. Confer w/ Buchalter to request pending invoice.	0.70	143.50
10-03-2023	YL	Review invoice and forward same to AR and AN to process. Review various outgoing wire transfers for payroll and payment of professional fees. Review of additional outgoing wire transfers.	1.00	315.00
10-03-2023	MA	Review wire and submit.	0.30	61.50
10-03-2023	CPLY	Confer w/ JD re: next report and bulk sales.	0.20	83.00
10-03-2023	JD	Review and approve expenses. Review on-site operations and fulfillment.	0.40	196.00
10-03-2023	CS	Continue reviewing returns status.	3.20	928.00

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Date	Timekeeper	Description	Hours	Amount
10-03-2023	CS	Finish checking prices for personal shoes uploaded by warehouse team. Check disputes, messages and recent orders.	2.90	841.00
10-03-2023	AN	Email to accounting requesting payment to C. Johnson for expense reimbursement.	0.20	74.00
10-04-2023	CS	Prepare inventory file updated to account for all sales. Continue listing eBay inventory.	3.10	899.00
10-04-2023	DS	Review sales, cash and accounting.	0.40	208.00
10-04-2023	DB	Review and respond to email inquiries. Update special service list and send to Buchalter.	0.40	64.00
10-04-2023	OJ	Accounting support analysis.	0.40	130.00
10-05-2023	DB	Process incoming mail.	0.10	16.00
10-05-2023	CS	Evaluate bulk offer update and send to JD.	1.80	522.00
10-05-2023	CS	Check disputes, messages and recent orders.	0.80	232.00
10-06-2023	CS	T/C w/ JD and revise counters for 2 bulk deals.	4.20	1,218.00
10-06-2023	CS	Check disputes, messages and recent orders.	0.80	232.00
10-06-2023	DB	Process incoming mail.	0.10	16.00
10-06-2023	JD	Review sales strategies and other operating decisions. Updates w/ CS re: same.	0.80	392.00
10-06-2023	JD	Review status of reporting. Follow ups w/ team.	0.40	196.00
10-08-2023	JD	Finalize and transmit counter offer to bulk sale.	0.40	196.00
10-08-2023	CPLY	Review edits to monthly accounting, process same and provide finalized report to team.	0.60	249.00
10-09-2023	CPLY	Additional edits to monthly accounting and provide amended report to team.	0.20	83.00
10-09-2023	DB	Process Report No. 13.	0.20	32.00
10-09-2023	CS	Work on counter offer and forward same to JD.	1.30	377.00
10-09-2023	CS	Check disputes, messages and recent orders.	0.80	232.00
10-09-2023	MH	Review counter from bulk buyer. Review and update to master tracker and offer database. Confer w/ JD and CS re: same.	0.70	290.50
10-09-2023	CPLY	T/C w/ CS re: bulk counter offer.	0.40	166.00
10-09-2023	CPLY	Finalize Zadeh report and exhibits. Confer w/ DB and JD re: same.	0.50	207.50

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Date	Timekeeper	Description	Hours	Amount
10-09-2023	JD	Review status of finalizing report. Review A/P and accounting.	0.40	196.00
10-09-2023	JD	Follow ups re: bulk offers. Provide inventory to additional party that signed NDA.	0.30	147.00
10-10-2023	CS	Check disputes, messages and recent orders. Check and edit pricing on non-sneaker items.	2.40	696.00
10-10-2023	DB	Process incoming mail.	0.10	16.00
10-10-2023	CS	T/Cs to B&M.	0.40	116.00
10-10-2023	OJ	Continue to review Trendz support analysis.	2.10	682.50
10-10-2023	CPLY	Begin to prep Report No. 14 and confer w/ JD re: same.	0.30	124.50
10-11-2023	MH	Confer w/ JD and CS re: bulk buyer pending sale and additional pending bulk sales. Review overall status of inventory and sales plans.	1.20	498.00
10-11-2023	DB	Review and respond to email inquiries re: status. Process court filed pleadings.	0.60	96.00
10-11-2023	CS	Check disputes, messages and recent orders.	0.80	232.00
10-11-2023	JD	Review and respond to bulk buyers. Confer w/ CS and MH re: review of offers and counters to same.	0.80	392.00
10-11-2023	CS	Discuss multiple bulk offers w/JD and MH.	1.20	348.00
10-11-2023	DB	Process monthly accounting.	0.10	16.00
10-12-2023	CS	Review bulk offer w/ JD and CP.	0.50	145.00
10-12-2023	CPLY	Discuss net winners w/ JD and CS.	0.30	124.50
10-12-2023	CPLY	Prepare comparison file to assess bulk offers. Confer w/ JD and CS re: same.	1.40	581.00
10-12-2023	MH	Confer w/ JD and CS re: offer items for bulk buyers. Review inventory.	0.40	166.00
10-12-2023	CS	Check disputes, messages and recent orders. Update inventory w/ most recent sales and send to CP and JD.	1.30	377.00
10-12-2023	AN	Review and approve timesheets and process payroll.	0.70	259.00
10-12-2023	JD	Update from Atty. Bitan re: contact from Oregon DOJ. Follow ups re: production of documents by Shopify, etc. and status of pending motion.	0.40	196.00
10-12-2023	JD	Updates re: status of next net winner complaints. Follow up w/ OJ re: status of requests for bank statements / activity. Follow ups re:	0.40	196.00

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Date	Timekeeper	Description	Hours	Amount
		same Follow up w/ Paypal for records. Email same.		
10-12-2023	JD	Confer w/ CS re: four pending bulk sales. Follow up w/ team re: same. T/C w/ additional bulk buyer. Update to counsel re: same.	1.10	539.00
10-13-2023	AN	Update cash and expenses in accounting. Process bank reconciliations. Prepare financials.	4.60	1,702.00
10-13-2023	CPLY	Revise bulk sales comparison file to evaluate whether there is sufficient inventory on hand to fulfill misc. bulk offers and add pricing details. Confer w/ JD re: same.	2.20	913.00
10-13-2023	OJ	Analyze net winner calculations and responses to winners. Recalculate net win amount based on support provided and discuss counteroffer and methodology w/ JD.	4.40	1,430.00
10-13-2023	MH	Review all current bulk offers w/ JD. Analysis of inventory and pricing.	0.80	332.00
10-13-2023	JD	Finalize for 4 pending bulk offers.	0.80	392.00
10-13-2023	JD	Confer w/ OJ re: status of net winner accounting. Review and respond to emails re: same. Respond to emails from Paypal re: request for records.	0.70	343.00
10-13-2023	CS	Check disputes, messages and recent orders. T/C w/ C. Johnson and email to eBay reps re: shipping labels.	1.40	406.00
10-14-2023	JD	Assess bulk offers, follow up w/ buyer re: same.	0.30	147.00
10-16-2023	MH	Review of updated analysis on bulk sales. Comparison of current offers vs. inventory. Confer w/ JD and CS re: same.	0.50	207.50
10-16-2023	CS	T/C w/ JD and edit bulk offer for review. Texts w/ C. Johnson re: general check in and shipping labels. T/C w/ JD re: final edits to counter. Pull down pairs from eBay and send final offer sheet to JD.	5.10	1,479.00
10-16-2023	OJ	Review correspondence re: net winner counter offers and status. Update summary matrix. Review net winner response letters. Review net winner accounting.	3.40	1,105.00
10-16-2023	CS	Check disputes, messages and recent orders.	0.80	232.00
10-16-2023	JD	Finalize bulk counter offer for Bulk Buyer A. Finalize review of Bulk Buyer D offer.	0.70	343.00
10-17-2023	CS	Texts w/ C. Johnson re: start staging new bulk deal. T/Cs w/ JD, rework deal and send for final approval. Adjust second bulk offer and send to JD. T/C w/ JD re: offers out today. Text w/ buyer re: status. T/Cs w/ JD and multiple buyers re: competing bids and inventory. Update master inventory.	3.30	957.00
10-17-2023	CS	Texts and emails re: shipping labels. T/C w/ JD re: art and general store performance. Check disputes, messages and recent orders. T/C w/ C. Johnson re: security camera offline.	1.70	493.00

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Date	Timekeeper	Description	Hours	Amount
		Research security options and send to JD.		
10-17-2023	OJ	Analyze net winner accounting and provide response to counsel.	3.30	1,072.50
10-17-2023	CPLY	Prep financials and update Report No. 14.	2.30	954.50
10-17-2023	JD	Review and respond to various bulk offers and finalize same. Updates w/ team re: same.	1.40	686.00
10-17-2023	JD	Confer w/ CP re: reporting. Confer w/ OJ re: net winners reviews. Email to Paypal re: requests.	0.40	196.00
10-18-2023	CS	T/Cs and emails w/ JD and C. Johnson re: security cameras. T/C w/ customer support. Check disputes, messages, recent orders and cancellation requests. Restore listings from buyer A takedown.	5.40	1,566.00
10-18-2023	OJ	Review responses re: Trendz offer and accounting.	0.30	97.50
10-18-2023	OJ	Compile and provide support reconciliation for net winner.	1.80	585.00
10-18-2023	CS	Review bulk sales and email to CP.	0.40	116.00
10-18-2023	OJ	Confer w/ JD and counsel re: net winner settlements and accounting analysis. Update net winner tracker and upload support to server.	1.30	422.50
10-18-2023	AR	Prepare and process deposit. Confer w/ AN re: check received and archive backup.	0.40	82.00
10-18-2023	CPLY	Confer w/ CS re: bulk orders and review file for same. Update language in report to reflect updates.	1.00	415.00
10-18-2023	JD	Confer w/ OJ re: review of Trends and Myths LLC materials. Review settlement proposals. Conf. call w/ OJ and counsel re: next steps and follow ups. Email to Atty. Kerin re: same.	0.80	392.00
10-18-2023	JD	Review status of reporting and financials. Update CP re: status of sales. Email next bulk sale to Lead Bank.	0.40	196.00
10-18-2023	MA	Review deposit slip.	0.10	20.50
10-18-2023	JD	Finalize and present bulk offer for consent by Lead Bank.	0.20	98.00
10-19-2023	AN	Review, research and respond to email from CS re: security camera access.	0.50	185.00
10-19-2023	DS	Review accounting and sales. Update w/ team.	0.40	208.00
10-19-2023	CS	T/Cs and emails w/ C. Johnson, JD and AN re: cameras. Email to JD re: approval for shipping label refund. Check disputes, messages and recent orders.	1.70	493.00
10-19-2023	CS	Email to JD re: sending inventory to buyer B. Logistics call w/	1.80	522.00

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Date	Timekeeper	Description	Hours	Amount
		buyer A and JD. T/C w/ C. Johnson re: staging buyer A order and buyer S recs. Email to buyer B re: current availability. Curate offer for buyer S and forward same to JD.		
10-19-2023	DB	Process monthly accounting. Update special notice list and forward to Buchalter.	0.30	48.00
10-19-2023	OJ	Review settlement discussions and accounting.	1.20	390.00
10-19-2023	JD	T/C w/ bulk buyer re: logistics. Follow ups to same. Confer w/ CS re: counters to various other bulk offers.	0.60	294.00
10-19-2023	JD	Review status of dashboard, sales and follow ups on requests from Malekzadeh's counsel. Updates re: same.	0.30	147.00
10-19-2023	JD	Review and approve draft of Receiver's Report. Follow up re: Chase monies and sales details included.	0.30	147.00
10-19-2023	CPLY	Review edits of monthly accounting. Process same and provide finalized report to team.	0.60	249.00
10-20-2023	CS	Texts w/ buyer A re: 3 shipments. Coordinate site visit and confer w/ JD re: same. Resend buyer S offer. Create offer for buyer C. Evaluate offer received from buyer B and forward same to JD.	5.10	1,479.00
10-20-2023	CS	Emails eBay re: shipping label. Check disputes, messages and recent orders.	1.20	348.00
10-20-2023	OJ	Update net winner matrix. Review and continue Ponzi scheme analysis. Review net winner accounting.	3.80	1,235.00
10-22-2023	JD	Review and respond to bulk offer emails.	0.30	147.00
10-23-2023	CS	Evaluate pricing on deal for buyer B. T/C w/ buyer A re: timing for pickup. Email to buyer A re: ordering supplies. T/Cs w/ buyer A and C. Johnson re: missing pairs. Update buyer S offer and send to JD.	2.30	667.00
10-23-2023	CS	Check disputes, messages and recent orders. Check prices across low selling listings.	3.70	1,073.00
10-23-2023	JD	Confer w/ CP re: reporting, analysis of inventory and sales and other. Follow ups to same.	0.40	196.00
10-23-2023	JD	Confer w/ CS re: response to bulk sales. Review files and counters and metrics re: same.	0.50	245.00
10-24-2023	YL	Review email and process funds transfer.	0.40	126.00
10-24-2023	JD	Review ops, fulfillment, pending litigation and reporting.	0.60	294.00
10-24-2023	JD	Finalize bulk offers and details.	0.50	245.00
10-24-2023	JD	Update call w/ Lead Bank. Discuss final settlement. Follow up w/ Atty. Bitan re: same.	0.40	196.00

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Date	Timekeeper	Description	Hours	Amount
10-24-2023	DS	Review sales and next steps. Meeting w/ JD re: bulk offers. Update on court reporting.	0.50	260.00
10-24-2023	AN	Review cash on hand, review and update expenses in accounting. Arrange funds transfer to operating account.	2.70	999.00
10-25-2023	CS	T/C w/ C. Johnson re: out today. Check disputes, messages and recent orders. Check and edit Flu Game pricing. Create inventory reconciliation and forward to JD.	3.90	1,131.00
10-25-2023	AR	Process wire payments. Confer w/ MA re: updated invoice for professional fees. Confer w/ AN re: same. Confer w/ AN re: difference on invoice.	1.20	246.00
10-25-2023	CS	T/C w/ JD re: several bulk deals. Send new buyer C offer to JD and file same. Evaluate new counter from buyer BA and send to JD. Texts w/ buyer A re: schedule. Evaluate offer from buyer C and email to JD and MH.	1.50	435.00
10-25-2023	MH	Review counter offer. Confer w/ CS and JD re: same.	0.30	124.50
10-25-2023	CPLY	Confer w/ JD re: discrepancy. F/U w/ AR re: same.	0.20	83.00
10-25-2023	OJ	Confer w/ JD re: Net Winners and confer w/ forensic accountant re: vendor status.	0.60	195.00
10-25-2023	JD	Finalize offers to Bulk Buyer A and Bulk Buyer C.	0.60	294.00
10-25-2023	MA	Confer w/ AR re: payment requested by AN.	0.10	20.50
10-25-2023	YL	Review outgoing wire transfer.	0.30	94.50
10-25-2023	CPLY	Follow up w/ counsel re: report. Confer w/ JD re: bulk sales.	0.20	83.00
10-26-2023	YL	Review various wire transfers.	0.40	126.00
10-26-2023	CS	T/Cs w/ C. Johnson and text w/ buyer A re: progress on staging buyer A deal 4 .	0.40	116.00
10-26-2023	CS	Set up security protect plan for warehouse. Check disputes, messages and recent orders.	1.00	290.00
10-26-2023	JD	Review status of Receiver's Report No. 14 and review exhibits for same.	0.50	245.00
10-26-2023	MA	Review ACH.	0.40	82.00
10-27-2023	MA	Review wire.	0.20	41.00
10-27-2023	AN	Review, research and respond to JD re: lease terms for Roosevelt.	0.60	222.00
10-27-2023	YL	Review outgoing wire transfer.	0.30	94.50

Thank you for trusting Stapleton Group, we appreciate your business. Page 7 of 9

Date	Timekeeper	Description	Hours	Amount
10-27-2023	JD	Review and approve A/P. Confer w/ OJ re: status of follow ups.	0.40	196.00
10-27-2023	CS	T/Cs w/ C. Johnson and JD re: bulk buyer A deal 4 progress and inventory issues.	1.60	464.00
10-27-2023	CS	Update inventory file. Check disputes, messages and recent orders.	1.60	464.00
10-27-2023	AR	Process wire payment. Process check run.	0.40	82.00
10-27-2023	DB	Process incoming mail.	0.10	16.00
10-29-2023	CS	Check and revise listing prices for slow sellers.	1.10	319.00
10-30-2023	CS	Review timesheets for warehouse crew. Check disputes, messages and recent orders.	1.00	290.00
10-30-2023	CS	T/C w/ C. Johnson re: update on buyer A deal 4 staging. T/Cs and texts w/ warehouse team, buyer A and JD re: scan issues.	0.70	203.00
10-30-2023	DB	Process monthly accounting.	0.10	16.00
10-30-2023	JD	Review status of fulfillment and inventory counts onsite.	0.40	196.00
10-30-2023	OJ	Review net winner status' and confer w/ counsel re: paypal records.	1.40	455.00
10-30-2023	AN	Review and approve timesheets and process payroll.	1.00	370.00
10-31-2023	AN	Confer w/ accounting and review invoices re: approval to pay reimbursable expense.	0.30	111.00
10-31-2023	JD	Conf. call w/ OJ and Atty. Bitan re: status of net winners negotiations, litigation and new facts. Follow ups re: net winner litigation. Confer w/ OJ re: same.	0.50	245.00
10-31-2023	JD	Updates re: bulk sales to Buyer B. Review staging w/ team.	0.30	147.00
10-31-2023	DS	Meeting w/ JD to review sales and plan for holidays.	0.60	312.00
10-31-2023	OJ	T/C w/ counsel and JD.	0.50	162.50
10-31-2023	OJ	Review net winner analysis. Review support.	2.20	715.00
10-31-2023	AR	Confer w/ DS re: A/P. Confer w/ AN re: same. Confer w/ vendor to request w9 form. Process ACH payment.	0.60	123.00
10-31-2023	CS	T/C w/ C. Johnson re: check-in. Check disputes, messages and recent orders.	1.00	290.00
10-31-2023	DB	Review and respond to email inquiry re: orders. Update special service list and send to Buchalter.	0.30	48.00

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Date	Timekeeper	Description	Hours	Amount
10-31-2023	CS	Review emails from buyer B and send offer list to C. Johnson for staging and remove inventory from eBay. Texts w/ JD re: update from buyer A.	0.80	232.00
<b>Total</b>			161.10	53,781.00

**Time Summary**

Timekeeper	Hours	Amount
Alicia Rodmel	3.30	676.50
Audrey Nefkens	10.60	3,922.00
Chase Stroman	79.50	23,055.00
Cooper Plyler	10.40	4,316.00
David Stapleton	1.90	988.00
Deborah Burger	2.50	400.00
Jake Diiorio	18.40	9,016.00
Mary Ann Arcenal	1.10	225.50
Michael Husted	3.90	1,618.50
Olivia Jones	27.10	8,807.50
Yenni Liang	2.40	756.00
<b>Total</b>	161.10	53,781.00

**Expense Summary**

Expense	Amount
Copies	4.20
Other	507.50
Postage & Correspondence	0.63
<b>Total Expenses</b>	512.33

**Total for this Invoice** 54,293.33

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**Stapleton Group**  
 514 Via De La Valle  
 Ste 210  
 Solana Beach, CA 92075  
 213-235-0600  
 www.stapletoninc.com

November 30, 2023

**Zadeh Kicks, LLC**

**Invoice Number: 6996**  
 Invoice Period: 11-01-2023 - 11-30-2023

**Time Details**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
11-01-2023	CS	T/Cs w/ C. Johnson and JD re: inventory scan. T/Cs to B&M Stores.	2.60	290.00	754.00
11-01-2023	AR	Confer w/ AN re: w9 form for new vendor and payment process by check.	0.20	205.00	41.00
11-01-2023	DB	Review and respond to email inquiries re: status. Update special service list.	0.50	160.00	80.00
11-01-2023	YL	Confer w/ JD re: exhibit submitted w/ report. Research same and provide response.	0.20	315.00	63.00
11-01-2023	CS	Check disputes, messages and recent orders.	0.80	290.00	232.00
11-01-2023	DS	Review sales plan.	0.20	520.00	104.00
11-01-2023	AN	Review cash on hand and review, reconcile and approve billing invoices from email. Update A/P files re: same.	0.70	370.00	259.00
11-02-2023	AN	Process approved payments for A/P items and forward same to accounting. T/C w/ guard service provider re: contract renewal. Review current schedule and draft email to JD re: approve renewal for same.	0.90	370.00	333.00
11-02-2023	DS	Review sales and bulk offers. Update re: consultant. Discuss holiday sale planning.	0.40	520.00	208.00
11-02-2023	DB	Review and respond to email inquiries.	0.20	160.00	32.00
11-02-2023	CS	Address inventory issues for bulk buyer A deal 4.	3.80	290.00	1,102.00

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Date	Timekeeper	Description	Hours	Rate	Amount
11-02-2023	AR	Confer w/ AN re: Snickers Con invoice.	0.10	205.00	20.50
11-02-2023	MH	Confer w/ JD re: general updates and strategy. T/C w/ CS, JD and Clint re: inventory counts, softwares and sale items.	1.00	415.00	415.00
11-02-2023	JD	Review staging of order for Bulk Buyer A w/ team. Follow ups to same w/ CS. T/C w/ rep for Bulk Buyer A.	0.50	490.00	245.00
11-02-2023	CS	Check disputes.	0.70	290.00	203.00
11-02-2023	OJ	Net winner analysis and review of support.	1.90	325.00	617.50
11-02-2023	JD	Review inventory reporting systems, etc. Confer w/ team re: same. Confer w/ DB re: quotes from inventory third parties.	0.60	490.00	294.00
11-02-2023	JD	Review update from OJ re: net winner and revised calculation and review of data. Follow ups to review share files produced of raw data from Petitioner's forensic accountant. Follow up w/ OJ re: same.	0.40	490.00	196.00
11-03-2023	MH	Confer w/ JD re: current bulk sale. Review offer sheets, quantity, and pricing. T/C w/ bulk byer team re: bulk sale offers and negotiations.	0.80	415.00	332.00
11-03-2023	CS	Confer w/ C. Johnson re: check-in and buyer B staging. Update bulk buyer B deal 4 and send to JD. T/ Cs w/ buyer A, JD and C. Johnson. Coordinate travel. Prep SPA for buyer A send to JD.	2.30	290.00	667.00
11-03-2023	DB	Process incoming mail. T/Cs w/ WIS re: inventory. Review and respond to email re: same.	0.60	160.00	96.00
11-03-2023	CS	Check disputes, messages and recent orders.	0.80	290.00	232.00
11-03-2023	JD	Finalize planning for bulk sale #8. Review consent for bulk sale #9.	0.60	490.00	294.00
11-03-2023	JD	Review email from counsel re: status. Follow ups to same. Follow up re: reporting.	0.40	490.00	196.00
11-06-2023	OJ	Review correspondence re: net winners.	0.80	325.00	260.00
11-06-2023	DB	Process incoming mail and Receiver's Report.	0.30	160.00	48.00
11-06-2023	CS	Travel to Eugene. Work to solve inventory/scan issues and settle all details in preparation for shipment for buyer A.	6.00	290.00	1,740.00
11-06-2023	OJ	Analyze previous valuations from net winners counsel. Confer w/ counsel re: open items and counter offers.	2.10	325.00	682.50
11-06-2023	CS	Check disputes.	0.40	290.00	116.00

Thank you for trusting Stapleton Group, we appreciate your business. Page 2 of 9

Date	Timekeeper	Description	Hours	Rate	Amount
11-06-2023	OJ	Review subpoena and related document request list.	0.70	325.00	227.50
11-06-2023	AN	Review and respond to JD re: guard service renewal. T/C w/ CS re: internet service provider and provide online access.	0.60	370.00	222.00
11-06-2023	CPLY	Clean read of report and prep Exhibits. Confer w/ DB re: same.	0.30	415.00	124.50
11-06-2023	JD	Review on-site details related to inventory management, security, consolidation and other. Confer w/ team re: same.	0.70	490.00	343.00
11-07-2023	JD	Review details re: exhibit for reports and narrative. Confer w/ team re: same.	0.40	490.00	196.00
11-07-2023	AN	Follow up email to and review responses from JD and CS re: contract renewal for guard service and security camera option. Confer w/ JD re: guard service needs. T/C w/ guard service provider re: short term contract and termination date.	0.80	370.00	296.00
11-07-2023	CS	Travel home from Eugene. Troubleshoot last minute inventory issues, prepare sale docs and obtain signature. Meet w/ buyer A to review final inventory, assist with packing and loading of inventory. T/Cs w/ JD re: finalized deal and wire. Prep file for bulk buyer B and send to JD.	7.10	290.00	2,059.00
11-07-2023	DB	Process revised report and forward to Buchalter for filing.	0.20	160.00	32.00
11-07-2023	JD	AM check-in w/ CS and C. Johnson re: load-out of bulk sale to Bulk Buyer A. T/C w/ Bulk Buyer B re: pending sales. Follow up w/ Bulk Buyer F.	0.40	490.00	196.00
11-07-2023	CS	Review procedure w/ warehouse team for pricing on eBay, tracking returns and inventory. Check disputes.	0.80	290.00	232.00
11-08-2023	CS	T/C w/ C. Johnson re: staging bulk buyer B. T/C w/ JD, prep file and send to buyer B. Create sale docs and send to buyer B for signature.	1.00	290.00	290.00
11-08-2023	DB	Process incoming mail, copies of report and other pleadings.	0.30	160.00	48.00
11-08-2023	CS	T/C w/ C. Johnson re: eBay prices. Check disputes.	0.50	290.00	145.00
11-09-2023	MLS	Record JE.	0.20	250.00	50.00
11-09-2023	DB	Process incoming mail.	0.20	160.00	32.00
11-09-2023	AN	Review and approve revised contract for guard service, forward same to team.	0.20	370.00	74.00

Thank you for trusting Stapleton Group, we appreciate your business. Page 3 of 9

Date	Timekeeper	Description	Hours	Rate	Amount
11-09-2023	CS	Check disputes, messages, recent orders and revise pricing on various listings. Start working on server organization.	2.60	290.00	754.00
11-09-2023	JD	Confer w/ OJ re: review of net winners updates and additional info. Follow ups to same.	0.40	490.00	196.00
11-09-2023	CS	Texts and T/Cs w/ JD and C. Johnson re: pickup for Buyer B and wire received. File sale docs. T/Cs w/ buyer A and C. Johnson. Confer w/ JD re: next pickup.	0.70	290.00	203.00
11-09-2023	OJ	Review net winner accounting.	1.20	325.00	390.00
11-10-2023	CS	Check disputes, messages and recent orders. Check and revise pricing on slow selling listings.	2.60	290.00	754.00
11-10-2023	OJ	Review and analyze net winners/ ponzi status. Confer w/ counsel and JD re: same. Redline and review letter to net winner. Create updated accounting analysis for letter.	3.10	325.00	1,007.50
11-10-2023	JD	Review status of all net winners litigation, accounting, other litigation, and next steps. Follow up w/ OJ re: same. Review status of sales and reporting.	0.70	490.00	343.00
11-10-2023	JD	Review and revise response letter to net winner. Confer w/ OJ re: same.	0.30	490.00	147.00
11-10-2023	CS	T/Cs and texts w/ buyer A and C. Johnson re: staging for order 4.2.	0.40	290.00	116.00
11-10-2023	MA	Review JE G/L. Confer w/ MS re: same.	0.20	205.00	41.00
11-11-2023	AN	Review, update and approve timesheets. Process payroll. Update cash and expenses in accounting. Bank reconciliations. Prepare financials. Prepare and report Q2 & Q3 payroll for worker's compensation audit.	5.60	370.00	2,072.00
11-13-2023	AR	Process wire payment.	0.30	205.00	61.50
11-13-2023	JD	Review status of settlement offers. Respond to emails re: same.	0.40	490.00	196.00
11-13-2023	JD	Review status of next round for Bulk Buyer A.	0.20	490.00	98.00
11-13-2023	YL	Review outgoing ACH transfers.	0.30	315.00	94.50
11-13-2023	MA	Review wire.	0.20	205.00	41.00
11-13-2023	CS	Confer w/ C. Johnson and Buyer A re: 4.2. T/C w/ C. Johnson re: schedule. Email to JD re: progress update for bulk A 4.2.	0.60	290.00	174.00
11-13-2023	CS	Text w/ E. Heisler re: sick day. Check disputes, messages and recent orders. Start checking all	3.80	290.00	1,102.00

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Date	Timekeeper	Description	Hours	Rate	Amount
		returns and confirm receipt.			
11-13-2023	AN	Email to JD re: account balances and request approval for transfers from income accounts to money market and operating.	0.30	370.00	111.00
11-14-2023	DS	Update w/ JD re: holiday sales and discussions w/ consultant.	0.30	520.00	156.00
11-14-2023	CS	Confer w/ E. Heisler re: out of office. Check disputes, messages and recent orders. Finish checking returns.	2.70	290.00	783.00
11-14-2023	CS	T/C w/ C. Johnson re: check-in and plan for Thursday buyer A 4.2. Email to JD re: same.	0.30	290.00	87.00
11-14-2023	JD	Review and approve A/P. Updates re: Settlements w/ Net Winners.	0.20	490.00	98.00
11-15-2023	CS	Check disputes, messages and recent orders. Check and revise listing prices.	3.50	290.00	1,015.00
11-15-2023	DB	Review and respond to email inquiries re: status.	0.60	160.00	96.00
11-15-2023	CS	Prep chain of custody and forward to buyer A for deal 4.2.	0.60	290.00	174.00
11-16-2023	JD	T/C w/ advisor re: sales strategies. Updates w/ CS re: same.	0.70	490.00	343.00
11-16-2023	AR	Confer w/ AN re: confirmation on ACH payment to Donlin Recano. Process ACH payment.	0.40	205.00	82.00
11-16-2023	DB	Process incoming mail.	0.20	160.00	32.00
11-16-2023	CS	Texts and T/Cs w/ C. Johnson, JD and buyer A re: status of pickup and payment.	0.50	290.00	145.00
11-16-2023	JD	Review and approve details for pick up of bulk sale.	0.40	490.00	196.00
11-16-2023	CS	Check disputes, message and recent orders.	0.80	290.00	232.00
11-16-2023	YL	Review and process wire transfer.	0.30	315.00	94.50
11-16-2023	MA	Review outgoing ACH. Confer w/ YL re: 2nd review.	0.10	205.00	20.50
11-16-2023	DS	Review site visit and meeting. Confer w/ counsel. Update and discuss w/ JD. Emails re: same.	0.40	520.00	208.00
11-17-2023	AN	Review and process payments for professional fees. Review cash on hand, request balance transfers.	0.90	370.00	333.00
11-17-2023	MA	Review outgoing wire and ACH. Confer w/ YL re: 2nd review	0.10	205.00	20.50

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Date	Timekeeper	Description	Hours	Rate	Amount
11-17-2023	CS	T/C w/ C. Johnson re: recap buyer A 4.2 and steps for 4.3.	0.40	290.00	116.00
11-17-2023	DB	Process incoming mail.	0.20	160.00	32.00
11-17-2023	YL	Prepare and process funds transfers. Review and process various outgoing wire transfers.	0.80	315.00	252.00
11-17-2023	CS	Check disputes, messages and recent orders.	0.80	290.00	232.00
11-17-2023	AR	Process ACH payments.	0.60	205.00	123.00
11-19-2023	CS	Check sales from the weekend and revise more pricing.	1.20	290.00	348.00
11-20-2023	CS	Texts w/ C. Johnson and buyer A re: pickup 3. T/Cs to B&M stores.	0.80	290.00	232.00
11-20-2023	DB	Process incoming mail. T/C from creditor.	0.30	160.00	48.00
11-20-2023	CS	T/C w/ C. Johnson re: general check-in. Check disputes, messages and recent orders. T/C w/ JD re: check-in and multiple items. Update inventory and send to JD.	2.00	290.00	580.00
11-20-2023	JD	Planning for Black Friday eBay sales. Confer w/ CS re: same. Review consultant offer. Updates w/ DS re: same.	0.50	490.00	245.00
11-20-2023	JD	Review settlement agreement for net winners. Provide comments re: same.	0.40	490.00	196.00
11-20-2023	JD	Confer w/ CP re: reporting and cash. Confer w/ OJ re: responses to production requests.	0.40	490.00	196.00
11-20-2023	OJ	Sort through files for documents requested. Send sharefile w/ same.	0.80	325.00	260.00
11-20-2023	MA	Review wires.	0.40	205.00	82.00
11-21-2023	OJ	Confer w/ JD re: correspondence for net winner's counsel. Email production and sharefile for Siara Sneakers to counsel.	1.50	325.00	487.50
11-21-2023	CS	Update offer for buyer S.	0.70	290.00	203.00
11-21-2023	CS	Check disputes, messages and recent orders. Pull eBay sales data and send to CP. Work on Black Friday sale and T/Cs w/ JD re: same.	2.90	290.00	841.00
11-21-2023	JD	Review Black Friday sales strategies. Confer w/ CS re: same.	0.60	490.00	294.00
11-21-2023	CPLY	Prepare financials and confer w/ CS and JD re: same. Update report.	2.50	415.00	1,037.50

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Date	Timekeeper	Description	Hours	Rate	Amount
11-22-2023	CS	T/C w/ eBay reps re: Black Friday sale. Finish prepping listings and publish Black Friday sale.	5.60	290.00	1,624.00
11-22-2023	JD	Review and finalize bulk sale counters.	0.30	490.00	147.00
11-22-2023	JD	Review and finalize bulk Black Friday sales details.	0.40	490.00	196.00
11-22-2023	JD	Review updates for Net Winners responses. Confer w/ OJ re: same.	0.20	490.00	98.00
11-22-2023	DS	Review holiday pricing and plan.	0.30	520.00	156.00
11-27-2023	JD	T/C w/ Attys. Bitan and Miller re: net winner review. Discuss settlements. Follow ups w/ OJ re: same. Review emails and responses to pending questions regarding various net winners.	0.80	490.00	392.00
11-27-2023	JD	Review on-site operations, inventory systems, Black Friday weekend sales, dashboard and other. Updates w/ DS re: same. Updates w/ CS re: sales inquiries.	0.70	490.00	343.00
11-27-2023	MH	Confer w/ JD re: holiday sales, bulk sales and current inventory count. Discussion re: inventory updates and go-forward strategy.	0.30	415.00	124.50
11-27-2023	OJ	Review documents from Acuity Forensics for bank and Paypal information.	2.80	325.00	910.00
11-27-2023	AR	Process wire transfer. Process check run. Process A/P and confer w/ AN re: same.	0.60	205.00	123.00
11-27-2023	CS	T/Cs and emails w/ JD and buyer re: cancelled eBay orders and price checking. Check disputes, messages and recent orders.	1.90	290.00	551.00
11-27-2023	MA	Review ACH.	0.20	205.00	41.00
11-27-2023	YL	Review outgoing wire transfer.	0.30	315.00	94.50
11-27-2023	DB	Process incoming mail. Update special service list. Send test emails to emails that were rejected. Review and respond to email inquiries.	0.40	160.00	64.00
11-27-2023	AN	Update rent expenses in accounting and process payment request re: same.	0.50	370.00	185.00
11-27-2023	CPLY	Final edits to Report No. 15. Confer w/ JD re: same.	0.40	415.00	166.00
11-28-2023	OJ	Compile and share all Amex records. Conduct net winner analysis for pre-020 transactions and shoe orders.	3.40	325.00	1,105.00
11-28-2023	CS	T/C w/ JD. Update inventory and send to JD. Check disputes, messages and recent orders. Update store	1.50	290.00	435.00

Thank you for trusting Stapleton Group, we appreciate your business. Page 7 of 9

Date	Timekeeper	Description	Hours	Rate	Amount
		banners.			
11-28-2023	JD	Review status of net winners details.	0.40	490.00	196.00
11-28-2023	JD	Review and finalize counter and send to Bulk Buyer L. Update w/ Bulk Buyer A. Plan for next pick-up.	0.50	490.00	245.00
11-29-2023	CS	Check disputes, messages and recent orders. Review lease for Roosevelt and email to JD.	1.90	290.00	551.00
11-29-2023	JD	Review gross sales to net sales. Review report and exhibits and confer w/ CP re: same. Provide comments re: reduction in overhead, etc.	0.60	490.00	294.00
11-29-2023	YL	Review edits to monthly accounting, process same and provide finalized report to team.	0.30	315.00	94.50
11-29-2023	DS	Review of sales.	0.30	520.00	156.00
11-29-2023	CS	Emails and calls w/ JD and buyer D re: honoring black Friday prices for previous bulk buyer. T/C w/ JD re: buyer D counter.	0.80	290.00	232.00
11-29-2023	AN	Review and approve timesheets, process payroll. Review reports re: same. Review multiple emails from JD, CS and C. Johnson re: notice to landlord for Roosevelt, inventory sales and counts and storage.	1.50	370.00	555.00
11-30-2023	DS	Review of case and next steps.	0.30	520.00	156.00
11-30-2023	JD	Review and respond to emails from CS re: marketplace sales and discounts.	0.20	490.00	98.00
11-30-2023	CS	T/C w/ C. Johnson re: check-in. Create list of SKUs for warehouse team to recount and email to C. Johnson re: same. Check prices for those listings and email to JD.	2.20	290.00	638.00
11-30-2023	CS	Texts w/ buyer A and C. Johnson re: pickup 4.3. Check disputes, messages and recent orders.	1.00	290.00	290.00
<b>Total</b>			130.50		42,512.00

### Time Summary

Timekeeper	Hours	Amount
Alicia Rodmel	2.20	451.00
Audrey Nefkens	12.00	4,440.00
Chase Stroman	69.60	20,184.00
Cooper Plyler	3.20	1,328.00
David Stapleton	2.20	1,144.00
Deborah Burger	4.00	640.00
Jake Diiorio	13.30	6,517.00
Marc Sable	0.20	50.00
Mary Ann Arcenal	1.20	246.00
Michael Husted	2.10	871.50

Thank you for trusting Stapleton Group, we appreciate your business. Page 8 of 9



<b>Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
Olivia Jones	18.30	5,947.50
Yenni Liang	2.20	693.00
<b>Total</b>	<b>130.50</b>	<b>42,512.00</b>

**Expense Summary**

<b>Expense</b>	<b>Amount</b>
Airfare	589.81
Copies	9.70
Lodging	201.24
Meals	36.88
Mileage	15.32
Other	8.00
Postage & Correspondence	1.89
Transportation	58.12
<b>Total Expenses</b>	<b>920.96</b>
<b>Total for this Invoice</b>	<b>43,432.96</b>

Thank you for trusting Stapleton Group, we appreciate your business. Page 9 of 9